

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

A. Justification

1. *Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.*

Information collection for the Centers for International Business Education (CIBE) program is necessary for institutions of higher education to receive grants. We permitted the last approval for the collection of information for this program (OMB number 1840-0616) to expire on 6/30/2008 because no competitions were scheduled for FY 2008. We now request approval to allow the International Education Programs Service (IEPS) to invite applications under the CIBE program in fall 2009, conduct peer reviews of grant applications, select grant recipients, and make new awards within established grant schedules in FY 2010.

Information Collection	CFDA No.	Date Respondents Submit Applications	Information Collection Required for Fiscal Year Awards (New)
Centers for International Business Education	84.220	10/2009	FY 2010

The CIBE program is authorized under part B, Title VI of the Higher Education Opportunity Act of 2008 (HEOA), (P.L.110-315). Other legislation and regulations relevant to this information collection include the Government Performance and Results Act; section 427 of the General Education Provisions Act; the Government Paperwork Elimination Act; and the Education Department General Administrative Regulations.

This information collection is being submitted under the Streamlined Clearance Process for Discretionary Grant Information Collections.

The CIBE program provides federal assistance to Centers for International Business Education that serve as national centers for the teaching of improved international business techniques, and develop regional resources to meet the international training needs of local businesses.

The authorizing legislation is included on pages 35-40 of the application packages attached to this supporting statement. There are no program specific regulations for this program.

2. *Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.*

Eligible institutions of higher education use the information to develop and submit grant applications to the Department of Education (ED). After grant applications are submitted, ED determines the budgetary and human resources it needs to conduct competitions. Expert review panels use the information to identify high-quality applicants. ED program officials consider the feedback from the expert review panels, in conjunction with the program's legislative purposes, when making funding recommendations. ED also uses the information collection to develop monitoring plans, to inform strategic planning, and to align program assessment standards with Department performance goals and initiatives.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

The information collection requires applicants for grants under the CIBE program to submit applications electronically using Grants.gov.

Program competitions are held every five years. The CIBE program will utilize the Grants.gov system for the first time in FY 2010. During prior competitions, the CIBE program used the Department's e-Grants system for submission of applications.

Regarding the use of other forms of information technology, we use the Department's Web site to inform prospective applicants about the program's funding opportunities and deadline dates. Application packages are posted on the Web site after the competition is closed, making access to them more effective and efficient. Additionally, we post Frequently-Asked Questions about these programs on our Web page, which makes technical assistance more immediate. As a technical assistance tool, we post abstracts of currently funded projects on ED's Web site to help prospective applicants better understand the kinds of activities and projects the program supports.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use of the purposes described in Item 2 above.

No other information collections duplicate what is being requested under this collection. Likewise, there is no duplication elsewhere in the Federal government of IEPS program planning and oversight activities associated with this program.

The legislative authority covered by this information collection is unique to the program. Because of these inherently unique programmatic characteristics, no other similar programs exist in the Department, and no similar programs exist in other Federal agencies.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The collection of information does not impact small businesses or other small entities.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If the collection is not conducted, ED cannot meet its grant making responsibilities, including the publication of closing date notices, providing technical assistance to new respondents, conducting peer

reviews of grant applications, transmitting slates with funding recommendations to program officials for approval, and making grant awards.

The Department needs to make grant applications available to its constituencies to give eligible applicants at least 30 days to develop and submit applications by the dates specified in Item 1, and to enable IEPS to make new fiscal year grant awards in a timely manner.

7. *Explain any special circumstances that would cause an information collection to be conducted in a manner:*

- *requiring respondents to report information to the agency more often than quarterly;*
- *requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;*
- *requiring respondents to submit more than an original and two copies of any document;*
- *requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;*
- *in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;*
- *requiring the use of a statistical data classification that has not been reviewed and approved by OMB;*
- *that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or*
- *requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.*

There are no circumstances that would cause this information collection to be conducted in this manner.

8. *If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.*

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information

activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

A notice regarding this information collection will be submitted for publication in the Federal Register. OMB will be apprised of public comments received, if any.

On a regular basis, we hold informal discussions with various constituents and potential respondents who have completed grant applications under this program to ascertain whether the instructions and forms are clear and applicant-friendly. These include project directors, deans, chairs of academic departments, language and area and international studies professors, fiscal representatives at institutions, and management analysts who are responsible for gathering the data needed to respond to the program's selection criteria.

Our day-to-day technical assistance, project monitoring, and site visits are the primary mechanisms we use to answer specific questions about the grant application instructions and to gauge whether or not application materials are useful and do not impose an unrealistic burden on respondents. Day-to-day technical assistance includes phone conversations, e-mails, faxes, and office visits. We also conduct technical assistance workshops at various conferences throughout the year. In sum, these processes collectively inform IEPS about the viability of the application materials we use for our programs. The professionals, administrators, and organizations cited above do not have adverse comments about the information being requested or about the time it takes to complete a grant application under this program.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Other than remuneration of grantees via grant awards, there are no payments or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Assurances of confidentiality related to this information collection are covered under the Privacy Act.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Questions of a sensitive nature are not asked.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.*

- *If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in item 13 of OMB Form 83-I.*
- *Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should not be included in Item 14.*

This request for approval covers information collections (application forms). Using the communication mechanisms described in Item 8, we contacted a sampling of respondents to get their input on the time and resources they require to complete grant applications. The table below presents the burden hour and cost for each form separately, as instructed.

The data in the table are estimates of the time it takes for respondents to complete official forms, develop the application narrative and budget, and submit completed applications through the Grants.gov system that responds to individual selection criteria.

Estimate of Annualized Burden Hours and Cost to Respondents

Information Collection (Grant Application)	Number of Respondents	Hours per Response	Total Hours	Frequency of Response	Wage per Hour	Annualized Cost for the Information Collection
Centers for International Business Education Program (CFDA 84.220)	50	100	5,000	Every 5 years	\$85	\$8,500

13. *Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)*

- *The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.*
- *If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.*

- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

Total Annualized Capital/Startup Cost:

Total Annual Costs (O&M) :

Total Annualized Costs Requested : _____

The program in this information collection does not have costs that meet the criteria for inclusion in Item 13.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The annualized cost to the Federal government in the table below includes costs related to primary operational and programmatic tasks necessitated by this collection of information. This information collection covers the CIBE program and requires the resources of one program officer, one branch chief to provide oversight, the occasional use of one administrative assistant, and external peer review panels to conduct the tasks.

Estimates of Annualized Cost to the Federal Government

Operational or Programmatic Task	Wage per Hour	Staff Resources	Total Hours	Cost to Federal Government
Gather data and develop OMB justification statement	\$50	1	20	\$1,000
Develop application forms and instructions	\$50	1	90	\$4,500
Develop Notice of Closing Date	\$50	1	30	\$1,500
Enter approved collection into EDICS	\$40	1	1	\$40
Enter application and forms into Grants.gov Application module for respondents to access	\$40	1	1	\$40
Post application on the Department's website	\$40	1	1	\$40
Establish reader panels in e-READER to evaluate 50 e-Applications	\$40	1	15	\$600
Send conflict of interest forms to reviewers; process certifications; mail e-READER manuals to reviewers	\$40	1	15	\$600
Conduct e-READING conference calls; monitor panels via e-mails; read reviewers' comments in e-READER	\$50	2	60	\$6,000

Download and print 50 applications and 200 technical review forms	\$40	1	70	\$2,800
Compensate 16 reviewers after certifying satisfactory completion of e-READING to evaluate applications	\$1000 flat rate	16	60	\$16,000
Review applications in funding range; prepare slate memo and attachments for review by Branch Chief	\$50	1	100	\$5,000
ED Program officials approve slate	\$150	3	3	\$1,350
Commit grants in GAPS	\$50	1	1	\$50
Team Leader obligates grants in GAPS	\$75	1	1	\$75
Review revised budgets; mail grant award documents	\$50	1	10	\$500
Document monitoring activities weekly for all projects in compliance with OPE standards	\$50	1	800	\$40,000
TOTAL			1278	\$80,095

15. *Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I*

No changes or adjustments are required.

16. *For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.*

There are no plans to publish the results of this collection of information.

17. *If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.*

We will display the expiration date.

18. *Explain each exception to the certification statement identified in Item 20, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.*

There are no exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

This collection does not employ statistical methods.